



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JRS/GK/DAS
F. #2021R00900

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 13, 2024

By FedEx

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Counsel for Ozy Media, Inc.

Counsel for Carlos Watson

Re: United States v. Carlos Watson and Ozy Media, Inc.
Criminal Docket No. 23-82 (EK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes on the enclosed hard drive a production of discovery in the above-captioned case. Passwords to the drive and the production will be provided by email.

This production includes records, Bates-numbered EDNYOZY003793061 to EDNYOZY003793099 and USAO-EDNYOZY000000613, from various sources. An index detailing those sources, which is Bates-numbered USAO-EDNYOZY000000614, will be provided by email. This production also includes records, Bates-numbered SEC-DOJ-EPROD-001767302 to SEC-DOJ-EPROD-001768418, provided by the Securities and Exchange Commission pursuant to an access request letter. An index relating to these records is being produced at Bates number EDNYOZY003793060.

Within this production is an extraction of certain materials from the defendant Carlos Watson's blue Apple iPhone with black case, Bates-numbered USAO-EDNYOZY000000613. Please note that the extraction produced herewith is a subset of materials from the extraction that the government previously produced under Bates number FILTER-EDNYOZY001899396.

This discovery is being provided to you pursuant to the protective order entered by the Court on April 21, 2023, which was later signed by Mr. Sullivan on May 24, 2023. See ECF Dkt. No. 54.

The government renews its request for reciprocal discovery from the defendants. Please note that the defendants' obligations under Fed. R. Crim. P. 16(b) include identification of "all non-impeachment exhibits [the defendants] intend to use in their defense at trial, whether the exhibits will be introduced through a government witness or a witness called by a Defendant." United States v. Napout, No. 15-CR-252 (PKC), 2017 WL 6375729, at *7 (E.D.N.Y. Dec. 12, 2017); accord United States v. Smothers, No. 20-CR-213 (KAM), 2023 WL 348870, at *22 (E.D.N.Y. Jan. 20, 2023).

If you have any questions or requests regarding further discovery, please do not hesitate to contact us.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
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Enclosure

cc: Clerk of the Court (EK) (by ECF) (without enclosures)